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MEMO ENDORSED

June 11, 2008

VIA FAX

Honorable Justice G. E. Lynch
United States Courthouse
500 Pearl St., Room 910
New York, NY 10007

Attn: Jose Lopez

Re: Bonilla v. Bennet Truck Transportation
07-CV--8254

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/12/08
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Dear Justice Lynch:

I represent the defendants in the above case. This letter is written in order to request a 45 day extension of the discovery schedule on the above case. The current cut off date is June 13, 2008. This is the first request for an extension. I have spoken to James Neville from plaintiff's office and he has agreed to the extension. For various reasons, including obtaining necessary medical records, the depositions on this case were not held until the end of May. The day after plaintiff's deposition, authorizations were provided for additional medical that parties became aware of at plaintiff's deposition. Defendants now seek a 45 day extension to hold physicals and exchange reports in this case. The physicals could not be scheduled and held until after plaintiff's deposition. Additionally, defendants may be scheduling one non party deposition which it appeared became necessary as a result of the depositions. We would request an extension until July 28, 2008.

There is also currently a settlement conference scheduled for June 20, 2008 at 10:00, which the Court indicated they would need to adjourn. I spoke with Mr. Lopez, and we were considering adjourning it until July 1st or 2nd. Given the need to hold physicals to price the case, we would request that the conference also be adjourned until sometime after July 28, 2008.

Thank you for your time and consideration.

*SO ORDERED
Gerard E. Lynch
GERARD E. LYNCH, U.S.D.J.

6/11/08

*A Legal Department of the Liberty Mutual Insurance Group

Very Truly Yours,
Doreen J. Correia

August 1, 2008
at 11am.

Cc:

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